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August 12, 1991

The Honorable James B. Busey Administrator Federal Aviation Administration 800 Independence Avenue, SW Washington, D.C. 20591-0001

Subject: Recommendation of the Air Carrier

Operations Subcommittee

Dear Admiral Busey:

The Air Carrier Operations Subcommittee of the Aviation Rulemaking Advisory Committee met on July 31, 1991, to discuss activities of the subcommittee's three established working groups. After several meetings, the Noise Abatement Working Group had completed their assigned task to develop minimum performance criteria for noise abatement departure procedures and presented their report to the subcommittee for approval. Working group participants, representing a broad spectrum of industry interests, did an excellent and timely job of developing their report with its five recommendations.

The subcommittee discussed the Noise Abatement Working Group report and, with one objection, voted to forward them to you for immediate action. There are two minority reports attached which deal primarily with the timing of the implementation of recommendations 1 and 4.

Recommendation 1 asks that minimum performance criteria contained in the working group's report should be incorporated into an advisory circular (AC). Recommendation 4 asks that a working group be established to assess a number of factors relating to noise abatement departure profiles. In anticipation of approval of this recommendation, the subcommittee established this new industry working group and their activity will be vital to develop a method and database for assessing community noise impacts. Their first meeting is scheduled for August 22, 1991, in Washington, D.C.

The Honorable James B. Busey August 12, 1991 Page Two

Two members of the working group felt that database information which is to be developed by the recommended working group would be an essential prerequisite for the evaluation of any potential AC containing minimum aircraft performance criteria. They felt that the publication of the AC for comments should be delayed pending the completion of the recommended working group's activities. These opinions are stated in the two minority reports of the working group report.

After discussion of the working group report, with the minority reports, the subcommittee voted to forward the recommendations as proposed with the further recommendation to the FAA that Recommendation 4 be implemented and a working group be established as soon as possible. Initial information generated by this new working group will be given to the FAA as soon as possible to be published with the AC in the Federal Register to assist in the evaluation of the proposed AC. It was the opinion of the subcommittee that the publication of the AC should not be delayed while waiting for information from the new working group.

In addition to publishing the draft AC for comments and approving the establishment of the additional working group, we ask you to implement the remaining three recommendations of the Noise Abatement Working Group in an appropriate format.

On behalf of the organizations and individuals participating in the activities of the Air Carrier Operations Subcommittee, we thank you for the assistance and support of your staff and the opportunity to be a part of this advisory process.

Sincerely,

William W. Edmunds, Jr., Chairman Air Carrier Operations Subcommittee

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cc: Air Carrier Operations Subcommittee